

# **EXHIBIT 11**

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS

VESTA CORPORATION, )  
Plaintiff, ) CIVIL ACTION NO. 4:15-CV-00719  
V. )  
VESTA MANAGEMENT SERVICES, LLC, )  
Defendant. )  
\_\_\_\_\_  
)

**DECLARATION OF BETHSAIDA SANCHEZ**

1. I am over the age of 18, believe in the obligations of an oath, and have personal knowledge of the matters set forth below.
2. I am an Administrative Assistant for Vesta Corporation, a Connecticut corporation with a principal place of business located at 175 Powder Forest Drive, Weatogue, Connecticut 06089.
3. I submit this declaration in support of plaintiff Vesta Corporation's Motion for Summary Judgment.
4. I have worked at Vesta Corporation since 2013.
5. As Property Management Coordinator, my job responsibilities include accepting calls that come in on our "Resident Hotline" and either resolving those concerns or contacting the appropriate Vesta Corporation staff member who can address the issue.
6. On or about January 8, 2015, I received a phone call on the "Resident Hotline" from a woman who called Vesta Corporation with a complaint about a property managed by Vesta Management Services, LLC in which she lived.
7. She told me that she had been given our "Resident Hotline" phone number by someone in the onsite office of the property in which she resided.

8. I placed the caller on hold and immediately informed Charles Moran, Executive Vice President of Vesta Corporation, of the incident. Mr. Moran oversees the operation of Vesta Corporation's communities, including responding to resident concerns. He told me to inform the caller that we did not manage the property in which she lived and to request the correct phone number for the property manager from the site office.

9. I informed her that Vesta Corporation did not manage the property in which she lived and told her to request the correct phone number for the property manager from the site office.

10. It is my standard practice to inform him of resident concerns that I receive and am unable to resolve myself.

11. Pursuant to 28 U.S.C. § 1746(2), I declare under penalty of perjury that the foregoing is true and correct.

Dated: October 20, 2015



---

Bethsaida Sanchez  
Property Management Coordinator  
Vesta Corporation